

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

21 MC 103

CESAR GUIRACOCHA,

08CV02272

Plaintiffs,

- against -

ON-SITE:

7 WORLD TRADE COMPANY, L.P.; A RUSSO WRECKING, INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC; ATLANTIC HEYDT CORP.; BECHTEL ASSOCIATES PROFESSIONAL CORPORATION; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERKEL & COMPANY, CONTRACTORS, INC.; BIG APPLE WRECKING & CONSTRUCTION CORP; BOVIS LEND LEASE LMB, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.; BURO HAPPOLD CONSULTING ENGINEERS, P.C; C.B. CONTRACTING CORP; CANRON CONSTRUCTION CORP.; CORD CONTRACTING CO., INC.; DAKOTA DEMO-TECH ; DIAMOND POINT EXCAVATING CORP; DIEGO CONSTRUCTION, INC.; DIVERSIFIED CARTING, INC.; DMT ENTERPRISE, INC. D'ONOFRIO GENERAL CONTRACTORS CORP.; EAGLE LEASING & INDUSTRIAL SUPPLY, INC.; EAGLE ONE ROOFING CONTRACTORS INC; EJ DAVIES, INC.; EN-TECH CORP.; EVERGREEN RECYCLING OF CORONA(EROC); EWELL W. FINLEY, P.C; EXECUTIVE MEDICAL SERVICES, P.C; FLEET TRUCKING, INC.; FRANCIS A. LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, INC; GILSANZ, MURRAY, & STEFICEK, LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC; HALLEN WELDING SERVICE, INC; H.P. ENVIRONMENTAL; KOCH SKANSKA INC; LAQUILA CONSTRUCTION INC; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS P.C; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC; PINNACLE ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PORT AUTHORITY OF NEW YORK AND NEW JERSEY; PRO SAFETY SERVICES LLC; PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES; ROBERT L. GEROSA,

INC.; RODAR ENTERPRISES, INC; ROYAL GM, INC; SAB TRUCKING INC.;
 SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING;
 SEMCOR EQUIPMENT & MANUFACTURING CORP.; SILVERITE
 CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEGER INC;
 SKIDMORE, OWING & MERRILL LLP; SURVIVAIR; TISHMAN CONSTRUCTION
 CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION
 CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION;
 TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC;
 TORRETTA TRUCKING, INC; TOTAL SAFETY CONSULTING, L.L.C; TUCCI
 EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC.; TURNER
 CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT
 VENTURE); VOLLMER ASSOCIATES LLP.; WEEKS MARINE, INC.;
 WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C; WHITNEY
 CONTRACTING INC; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE
 CENTER PROPERTIES LLC; WSP CANTOR SEINUK; YANNUZZI & SONS, INC;
 YONKERS CONTRACTING COMPANY, INC; YORK HUNTER CONSTRUCTION,
 LLC; ZIEGENFUSS DRILLING, INC,

OFF-SITE:

110 CHURCH LLC, 53 PARK PLACE LLC, 55 WATER STREET CONDOMINIUM,
 90 CHURCH STREET LIMITED PARTNERSHIP, ALAN KASMAN DBA KASCO,
 AMBIENT GROUP, INC., ANN TAYLOR STORES CORPORATION,
 BANKERS TRUST COMPANY, BATTERY PARK CITY AUTHORITY, BELFOR
 USA GROUP, INC., BLACKMONMOORING- STEAMATIC CATASTOPHE, INC.
 D/B/ABMS CAT, BOARD OF MANAGERS OF THE HUDSON VIEW
 EAST CONDOMINIUM, BOSTON PROPERTIES, INC., BROOKFIELD FINANCIAL
 PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD
 PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION,
 BROOKFIELD PROPERTIES HOLDINGS INC., BT PRIVATE CLIENTS CORP.,
 DEUTSCHE BANK TRUST COMPANY, DEUTSCHE BANK TRUST COMPANY
 AMERICAS, DEUTSCHE BANK TRUST CORPORATION, ENVIROTECH
 CLEAN AIR, INC., GPS ENVIRONMENTAL CONSULTANTS, INC, GRUBB &
 ELLIS MANAGEMENT SERVICES, HILLMAN ENVIRONMENTAL GROUP, LLC,
 HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS
 ASSOCIATES, INDOOR ENVIRONMENTAL TECHNOLOGY, INC, KASCO
 RESTORATION SERVICES CO., LIBERTY VIEW ASSOCIATES, L.P.,
 LIONSHEAD 110 DEVELOPMENT LLC, LIONSHEAD DEVELOPMENT LLC,
 MERRILL LYNCH & CO, INC., MOODY'S HOLDINGS, INC, NEW WATER
 STREET CORP., NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES
 INTERNATIONAL, INC., R Y MANAGEMENT CO., INC., RELATED BPC
 ASSOCIATES, INC, RELATED MANAGEMENT CO., LP, RY MANAGEMENT,
 STRUCTURE TONE (UK), INC, STRUCTURE TONE GLOBAL SERVICES, INC,
 THE BANK OF NEW YORK TRUST COMPANY NA, THE RELATED
 COMPANIES, LP, THE RELATED REALTY GROUP, INC, TISHMAN INTERIORS
 CORPORATION, TOSCORP INC, TUCKER ANTHONY,

INC, TULLY CONSTRUCTION CO, INC, TULLY INDUSTRIES, INC, VERIZON
NEW YORK, INC, WESTON SOLUTIONS, INC, WFP TOWER A CO, WFP TOWER
A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP.,
WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., WFP TOWER D CO.
G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO.
II L.P., WFP TOWER D HOLDING I G.P. CORP., AND
WFP TOWER D. CO., L.P., ET AL

Defendants.

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**ENVIROTECH CLEAN AIR'S ANSWER TO CHECK OFF COMPLAINTS
RELATED TO THE MASTER COMPLAINTS**

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc.
("Envirotech"), as and for their responses to the allegations set forth in the Complaint by
Adoption ("Check-off Complaint") related to the Master Complaints filed in the 21 MC
100 and 21 MC 102 actions, hereby adopts Envirotech's Answer to the Master Complaint
dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower
Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the
above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
June 6, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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